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May 10, 2017

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th St., SW
Washington, DC 20554

Re: Notice of Oral *Ex Parte* Presentation
WT Docket No. 10-119

Dear Ms. Dortch:

On May 9, 2017, Michael Lewis and I, representing Motorola Solutions, Inc. ("MSI"), met with Rachael Bender, Legal Advisor to Chairman Pai, to discuss issues raised in the Commission proceeding to review the rules governing the Personal Radio Services ("PRS") authorized under Part 95 of the rules¹ and the public version of the April 27, 2017 draft report and order on Part 95 PRS reform released by the Commission.²

During the meeting, we indicated that MSI supports the Draft R&O's determination to allow the transmission of GPS location information and user-generated text messages over the GMRS frequencies.³ We further stated that MSI supports the Draft R&O's decision to allow automatic transmissions, rather than only manually triggered transmissions.⁴

We did report, however, that MSI recommends that the Commission not limit these automatic transmissions to a single response containing location information but, rather, allow subsequent automatic responses, so as to increase the potential utility of the technology for safety-related applications.⁵ We noted that the NPRM, in seeking comment on the original Garmin petition,

¹ See Review of the Commission's Part 95 Personal Radio Services Rules, WT Docket No. 10-119, *Notice of Proposed Rulemaking and Memorandum Opinion and Order on Reconsideration*, 25 FCC Rcd 7651 (2010) ("NPRM").

² Fact Sheet, *Part 95 Personal Radio Service Reform*, WT Docket No. 10-119 (rel. April 27, 2017) ("Draft R&O").

³ See Draft R&O at ¶ 38.

⁴ *Id.*

⁵ One approach that we suggested would enable multiple automatic responses would be to allow a unit responding to a message to respond with both its location information and its own request

provided adequate notice that it was thereby seeking comment on the content, frequency, and manual or automatic nature of such messages.⁶ Therefore, Motorola's previous submissions asking that the Commission allow multiple automatic responses created the necessary record for this request.⁷

Finally, citing the relatively low turnover and longer development timelines for these devices, we also requested that the Commission grant five years, rather than the 18 months described in the Draft R&O, for the continued sale of combination GMRS/FRS units.

for the other unit's location. However, regardless of the mechanism, we believe that multiple automatic responses should be allowed.

⁶ See *NPRM* at fn. 89 ("Garmin also recommends that digital data transmissions (1) must be initiated by a manual action or command by the user, except that a GMRS unit receiving an interrogation request may automatically respond with its location; (2) not exceed one second; and (3) generally be limited to no more than one digital transmission within a thirty-second period, except that a GMRS unit may automatically respond to more than one interrogation request received within a thirty-second period."); See also, *NPRM* at ¶ 42 ("We seek comment on this proposal and on the public interest and personal safety benefits of allowing such transmissions in the GMRS. Interested parties should address any concerns regarding increased interference potential to voice communications as well as ways to minimize such interference, including channel restrictions and duty cycle requirements. Finally, commenters should address whether all or only some GMRS channels should be permitted to transmit location information.")

⁷ See Comments of Motorola, Inc., WT Docket No. 10-119, filed September 3, 2010 and Motorola Solutions has previously participated in this proceeding under the corporate name Motorola, Inc. On January 4, 2011, Motorola, Inc. completed the separation of its Mobile Devices and Home businesses and changed its name to Motorola Solutions, Inc; Letter from Michael A. Lewis, representing Motorola Solutions, Inc., to Marlene H. Dortch, Sec'y, Federal Communications Commission, WT Docket No. 10-119, filed June 8, 2015; Letter from Edward "Smitty" Smith, representing Motorola Solutions, Inc., to Marlene H. Dortch, Sec'y, Federal Communications Commission, WT Docket No. 10-119, filed April 17, 2017.

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This notification is submitted in accordance with Section 1.1206 of the Commission's rules, 47 C.F.R. § 1.1206. Please let me know if there are any questions about this submission.

Sincerely,

/s/ Edward "Smitty" Smith
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Partner
DLA Piper LLP
Counsel for Motorola Solutions, Inc.

CC:
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